November 25, 2013

Mr. Gene Swearingen Town Manager Town of Garrett Park 4600 Waverly Avenue P.O. Box 84 Garret Park, MD 20896

Re:

Safe Routes to School Project - Garrett Park

Montgomery County, MD

Dear Mr. Swearingen:

Thank you for providing the Maryland Historical Trust (Trust) with information regarding the above-referenced project. We have reviewed the information in accordance with Section 106 of the National Historical Preservation Act and the Maryland Historical Trust Act of 1985, as appropriate, and we are writing to provide you with information on historic properties and specific recommendations for continuing consultation with our office.

According to your letter, the Town of Garrett Park (Town) is proposing to use federal funds under the Safe Routes to School (SRTS) program to improve access to the Garrett Park Elementary School. The SRTS program, funded by the Federal Highway Administration (FHWA) and administered through the Maryland State Highway Administration (SHA), provides opportunities to make walking and bicycling to school safer and more accessible for children, including those with disabilities, and to increase the number of children who choose to walk and bicycle. The SRTS program makes funding available for a wide variety of programs and projects, from building safer street crossings to establishing programs that instruct children and their parents on how to walk and bicycle safely to school. The work proposed by the Town includes the design and construction of sidewalks, curbs, ADA ramps, driveway crossings, crosswalks and signage along portions of Oxford Street, Kenilworth Avenue, Montrose Avenue and Clermont Avenue.

These construction activities would occur within the Garrett Park Historic District (MIHP No. M: 30-13), which was listed in the National Register of Historic Places in 1975. The historic district encompasses a 154-acre residential community established along the Baltimore & Ohio Railroad in the 1890s and incorporated in 1898. The district contains an assortment of well-preserved and representative architectural styles constructed between the 1890s to the mid-twentieth century. The historic district is significant since it represents the fulfillment of the original developer's plans for a sylvan residential community. The community's promotional brochure from 1890 describes the available building lots as "fronting on picturesque winding park roads." Another promotional pamphlet in 1887 states that noted horticulturalist and landscape designer William Saunders provided the design and landscape plans for the community. Saunders was the U.S. Department of Agriculture's first botanist and landscape designer. He introduced hundreds of economically important plants to the United States and designed landscape plans for many estates and major cemeteries, such as the Soldiers National Cemetery at Gettysburg. Overall, the buildings, roadway patterns and lush mature landscape all contribute to the historic significance of the community.

Martin O'Malley, Governor Anthony G. Brown, Lt. Governor

Richard Eberhart Hall, AICP, Secretary

Amanda Stakem Conn, Esq., Deputy Secretary

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The Trust is unable to fully assess the impact of this undertaking on the Garrett Park Historic District until we have more detailed information, including justification as well as preliminary project plans. However, based on the description of the proposed work, it is the Trust's opinion that this project has the potential to adversely affect the Garrett Park Historic District. The installation of sidewalks and curbs, along with the removal of mature trees and other landscaping, could adversely impact historic characteristics and features that contribute to the significance of the historic district. We strongly encourage the Town to fully explore all prudent and feasible alternatives that would address the project needs yet avoid and minimize the potential for adverse effects to this historic community.

The Trust offers the following guidance and questions for the Town's consideration as you continue planning for improved pedestrian access to school:

- We acknowledge the worthy purpose of the SRTS program and we encourage activities that enhance the safety of all our citizens. The Town should explore alternative programs available through SRTS to provide safety education to all community residents on the use of streets within Garrett Park. Another non-invasive alternative includes the discreet installation of safety and advisory signage along the school routes that alert drivers to the shared-use of the roadway with pedestrians. A variety of other non-construction activities may meet the goals of the SRTS programs and improve pedestrian safety. The Town should thoroughly explore such alternatives for this project.
- The Town should reassess the need for sidewalks and curbs along the roadways. The installation of curbs and removal of mature vegetation would drastically alter the district's park-like setting. Is there a need for drainage improvement along these roadways? Does the Town have a record of incident data or other information that explains the need for the construction of sidewalks and curb? The Town should explain the purpose and justify the need for the sidewalks and curbs.
- The Town should explore all available design variances and minimum standards when planning the size and location of any potential new sidewalks in the district. Since the sidewalks are not located along state roadways, the sidewalks only need to adhere to the federal ADA standards instead of the state standards. The Town should examine the possibility of reclassifying any new sidewalks to a trail, or other pathway, which may allow for greater design flexibility and more relaxed design standards.
- The careful consideration of context sensitive design solutions will help to avoid and minimize adverse effects to the district. For instance, proposed new sidewalks within the district should be treated as pedestrian pathways. A landscaped buffer area should be maintained between the roadway and the sidewalk. The sidewalk should utilize a graceful curving alignment to avoid mature landscape and appear as through the pathway has naturally occurred. Alternative materials should be used for the sidewalk such as tinted concrete with exposed aggregate or color-tinted asphalt. All efforts should be made to maintain existing mature trees and landscaping to avoid impacts to these character defining features of the district.
- As you know, the views of the interested public play a key role in project planning, particularly for projects
 receiving public funding assistance. The Town should continue to seek and consider the opinions of the
 affected property owners and residents throughout the project planning process. We would appreciate
 receiving copies of comments received by the Town.

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Finally, we recommend that the Town directly involve SHA and FHWA in its continued planning efforts for
this project. These transportation agencies have considerable knowledge and experience, at the statewide
and national level, in the design and planning of transportation improvements that meet safety and historic
preservation needs. Their expertise may prove invaluable in developing viable alternatives for the Garret
Park project.

We look forward to working with all involved parties to enhance the safety of the Garrett Park community and ensure the appropriate stewardship of this unique historic district. If you have questions or require further assistance, please contact Beth Cole (for archeology) at 410-514-7631 / bcole@mdp.state.md.us or Tim Tamburrino (for the historic built environment) at 410-514-7637 / ttamburrino@mdp.state.md.us.

Thank you for providing us this opportunity to comment.

Sincerely,

J. Rodney Little

Director/State Historic Preservation Officer

JRL/TJT 201304756

Cc:

The Honorable Jennie M. Forehand Scott Whipple (Montgomery County HPC) Jeanette Mar (FHWA) Caryn Brookman (SHA) Jessica Silwick (SHA) Barbara Jackson (via email)

Charles Snyder (via email)